

EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Walters v. City of Flint et al.,

No. 5:17-cv-10164

Hon. Judith E. Levy

Mag. Elizabeth Stafford

**BELLWETHER PLAINTIFFS' SUPPLEMENTAL¹ REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA
NORTH AMERICA INC., AND VEOLIA WATER NORTH AMERICA OPERATING
SERVICES, LLC**

Bellwether Plaintiffs ("Plaintiffs") request pursuant to Federal Rule of Civil Procedure 34(a) and the Fifth Amended Case Management Order entered by the Court that Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC ("the VNA Defendants") produce all of the following documents and tangible things for inspection and copying or photographing at the offices of LEVY KONIGSBERG, LLP, 605 Third Avenue, 33rd Floor, New York, New York 10158 on December 10, 2021.

¹ To the extent there is any doubt as to whether the documents requested herein should be included in the production associated with the previous requests for production of documents Plaintiffs served on the VNA Defendants on November 8, 2021, this supplemental request is intended to clarify that issue.

DEFINITIONS

The terms “VNA Defendants” mean VNA LLC, VNA Inc., and VWNAOS, or any one or more of them who have been named in the various *In Re Flint Water Cases*.

NOTE

Plaintiffs reminds the VNA Defendants of their obligation to produce not only documents that are within their actual possession but also those that are within their control, including those which they have a legal or contractual right to obtain from the person with actual possession or custody of them and those which they can make available to Plaintiffs by providing a suitable authorization for release of them to Plaintiffs’ Counsel. These requests shall all be understood to seek not only hard copy documents but also electronically kept documents.

REQUESTS

REQUEST NO. 1:

All transcripts of testimony taken in the Pittsburgh Water and Sewer Authority’s arbitration suit commenced on about October 12, 2016 before the American Arbitration Association against Veolia North America-Northeast LLC, including without limitation any testimony given by Marvin Gnagy or Robert Nicholas, whether in a deposition or other discovery proceeding or else in any merits proceeding or hearing of the arbitration suit.

RESPONSE NO. 1:

Dated: November 10, 2021

Respectfully submitted,

/s/ Corey M. Stern

Corey M. Stern

Renner K. Walker

LEVY KONIGSBERG LLP

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CERTIFICATE OF SERVICE

I, Renner K. Walker, certify that I served the within BELLWETHER PLAINTIFF'S SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH AMERIC INC., AND VEOLIA WATER NORTH AMERICA OPERATING SERVICES, LLC on November 10, 2021 to the VNA Defendants' counsel of record by electronic mail.

/s/ Renner K. Walker
Renner K. Walker